IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

RICHARD LEE BROWN, ET AL.,

Plaintiffs,

V.

ALEX AZAR,

IN HIS OFFICIAL CAPACITY AS SECRETARY U.S. DEPARTMENT OF HEALTH AND HUMAN SER-VICES

and

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

and

NINA B. WITKOFSKY,

IN HER OFFICIAL CAPACITY AS ACTING CHIEF OF STAFF U.S. CENTERS FOR DISEASE CONTROL AND PREVENTION,

Defendants,

CIVIL ACTION NO. 20-cy-03702-JPB

BRIEF OF AMICI CURIAE OF THE AMERICAN ACADEMY OF PEDIATRICS, ET AL.

APPENDIX B

TABLE OF AUTHORITIES

Statutes
Coronavirus Aid, Relief, and Economic Security (CARES) Act, Pub. L. No. 116-136, § 4024, 134 Stat. 281, 491 (2020)
Other Authorities
Abhishek Bakuli et al., Effects of Pathogen Dependency in a Multi-Pathogen Infectious Disease System Including Population Level Heterogeneity — A Simulation Study, 14 THEORETICAL BIOLOGY & MED. MODELLING 1, 1 (2017)
Alexandra B. Collins et al., Surviving the Housing Crisis: Social Violence and The Production Of Evictions Among Women Who Use Drugs In Vancouver, Canada, 51 HEALTH & PLACE 174, 179 (2018)
Alison Rodriguez, Nearly Half of All Medical Care in the US is in Emergency Departments, AJMC (Oct. 24, 2017)21
Am. Acad. of Pediatrics, Providing Care for Children and Adolescents Facing Homelessness and Housing Insecurity (2020)
American Housing Survey, U.S. CENSUS BUREAU (2020)6
America's Rental Housing 2020, Joint Ctr. for Housing Stud. of Harv. U. 4, 26 (2020)
Andreas Pilarinos et al., <i>The Association Between Residential Eviction and Syringe Sharing Among A Prospective Cohort of Street-Involved Youth</i> , 14 HARM REDUCTION J. 1, 3 (2017)
Andrew R. Zolopa et al., HIV and Tuberculosis Infection in San Francisco's Homeless Adults: Prevalence and Risk Factors in a Representative Sample, 272 JAMA 455, 458 (1994)
BENJAMIN F. TERESA, RVA EVICTION LAB, THE GEOGRAPHY OF EVICTION IN RICHMOND: BEYOND POVERTY (2017)
B.L. Gleason et al., Geospatial Analysis of Household Spread of Ebola Virus in Quarantined Village – Sierra Leone, 2014, 145 EPIDEMIOLOGY & INFECTION 2921, 2921 (2017)
Brodie Fraser et al., LGBTIQ+ Homelessness: A Review of the Literature, 16 INT'L J. ENV'L RES. & PUB. HEALTH 1, 1 (2019).

C. Andrew Aligne, Overcrowding and Mortality During the Influenza Pandemic of 1918: Evidence from U.S. Army Camp A.A. Humphreys, Virginia, 106 Am. J. Pub. Health 642, 642 (2016)
Chester Hartman & David Robinson, <i>Evictions: The Hidden Housing Problem</i> , 14 HOUSING POL'Y DEBATE 461, 467 (2003)30
COVID-19 Basics, HARV. MED. SCH. (last updated Oct. 1, 2020)19
COVID-19 Hospitalization and Death by Race/Ethnicity, CTRs. FOR DISEASE CONTROL & PREVENTION (Aug. 18, 2020)
COVID-19 Pandemic Planning Scenarios, CTRS. FOR DISEASE CONTROL & PRE- VENTION (Sept. 10, 2020)
Craig Evan Pollack, Kathryn M. Leifheit, & Sabriya L. Linton, <i>When Storms Collide: Evictions, COVID-19, And Health Equity</i> , HEALTH AFF. (Aug. 4, 2020)
Danya E. Keene, "That Wasn't Really a Place to Worry About Diabetes": Housing Access and Diabetes Self-Management Among Low-Income Adults, 197 Soc. Sci. & Med. 71 (2018).
Deena Greenberg et al., <i>Discrimination in Evictions: Empirical Evidence and Legal Challenges</i> , 51 <i>HARV. CIV. RTS-CIV. LIBERTIES L. REV.</i> 115 (2016)30
Diabetes Prevalence and Glycemic Control Among Adults Aged 20 and Over, By Sex, Age, and Race and Hispanic Origin: United States, Selected Years 1988–1994 Through 2013–2016, CTR. FOR DISEASE CONTROL & PREVENTION (2018)
Dusica Lecic Tosevski & Milica Pejovic Milovancevic, <i>Stressful Life Events and Physical Health</i> , 19 Current Opinion Psychiatry 184, 185, 187 (2006)
E. Drucker et al., Childhood Tuberculosis in the Bronx, New York, 343 LANCET 1482, 1482 (1994)
Elise D. Riley et al., COVID-19 and HIV Spotlight the U.S. Imperative for Permanent Affordable Housing, CLINICAL INFECTIOUS DISEASES (forthcoming 2020) (manuscript at 4).
Elizabeth Kneebone & Cecile Murray, <i>Estimating COVID-19's Near-Term Impact on Renters</i> , U.C. Berkeley Turner Cnt. for Housing Innovation (Apr. 24, 2020).
4V4V1

Emily A. Benfer & Allyson E. Gold, There's No Place Like Home: Reshaping Community Interventions and Policies to Eliminate Environmental Hazards and Improve Population Health for Low-Income and Minority Communities, 11 HARV. L. & POL'Y REV. S1, S1, S6 (2017)
Emily A. Benfer, Seema Mohapatra, Lindsay F. Wiley, & Ruqaiijah Yearby, Health Justice Strategies to Combat the Pandemic: Eliminating Discrimination, Poverty, and Health Inequity During and After the COVID-19, YALE J. HEALTH POL'Y L. & ETHICS (forthcoming 2020)
Emily Benfer et al., <i>The COVID-19 Eviction Crisis: An Estimated 30-40 Million People in America are at Risk,</i> ASPEN INST. (Aug. 7, 2020)
Emily Benfer, Health Justice: A Framework (and Call to Action) for the Elimination of Health Inequity and Social Injustice, 65 Am. U. L. Rev. 275, 275 (2015)
Eric Lofgren et al., <i>Influenza Seasonality: Underlying Causes and Modeling Theories</i> , 81 J. VIROLOGY 5429, 5431 (2007)
Eviction Filings Are Barrier to Finding Future Housing—Even for Tenants Who Are Not Evicted, Law. Committee for Better Housing (Mar. 7, 2018)23
Gabriel L. Schwartz, <i>Cycles of Disadvantage: Eviction & Children's Health in the United States</i> (2020) (unpublished Ph.D. dissertation, Harvard University, on file with author)
Gabriel L. Schwartz, Kathryn M. Leifheit, Jarvis T. Chen, Mariana C. Arcaya, Lisa Berkman, Childhood Eviction and Cognitive Skills: Developmental Timing-Specific Associations in an Urban Birth Cohort (unpublished manuscript under publication review on file with author)
Gabriel L. Schwartz, Kathryn M. Leifheit, Lisa Berkman, Jarvis T. Chen, Mariana C. Arcaya, Health Selection Into Eviction: Adverse Birth Outcomes And Children's Risk Of Eviction Through Age 5 (unpublished manuscript under publication review)
Gabriel L. Schwartz, Kathryn M. Leifheit, Lisa Berkman, Mariana Arcaya, Jarvis T. Chen, Is Eviction Poisonous? A Survival Analysis of Eviction and Lead Poisoning in a National Urban Birth Cohort (unpublished manuscript) (on file with author)
Geographic Information, U.S. BUREAU OF LAB. STAT. (last visited Oct. 1, 2020)

Gregorio A. Millett et al., Assessing differential impacts of COVID-19 on black communities, 47 ANNALS OF EPIDEMIOLOGY, 37 (July 2020)33
Healthy Homes and Communities: Putting the Pieces Together, 40 Am. J. Preventive Med. S48, S51 (2011)
HEATHER SANDSTROM & SANDRA HUERTA, URBAN INST., THE NEGATIVE EFFECTS OF INSTABILITY ON CHILD DEVELOPMENT: A RESEARCH SYNTHESIS 6 (2013)
Heidi L. Allen et al., Can Medicaid Expansion Prevent Housing Evictions?, HEALTH AFF. (Sept. 2019)
Homelessness & Health: What's the Connection?, NAT'L HEALTHCARE FOR THE HOMELESS COUNCIL (Feb. 2019)
Homelessness Just 'One of The Concerns' When Someone Is Evicted, NEWSWISE (Jan. 28, 2020)
Housing is the Best Medicine: Supportive Housing and the Social Determinants of Health, Corp. for Supportive Housing (July 2014)
Hugo Vásquez-Vera et al., <i>The Threat of Home Eviction and Its Effects on Health Through the Equity Lens: A Systemic Review</i> , 175 Soc. Sci. & Med. 199, 202–205 (2017)
Janelle Jones, <i>The Racial Wealth Gap: How African-Americans Have Been Shortchanged Out of the Materials to Build Wealth</i> , ECON. POL'Y INST. (Feb. 13, 2017, 12:01 PM)
Jasper Scherer & Sarah Smith, <i>Houston's \$15 Million Rental Assistance Program Fills Up in 90 Minutes</i> , HOUSTON CHRON. (May 13, 2020)9
Julia Bolívar Muñoz et al., <i>The Health of Adults Undergoing an Eviction Process</i> , 30 GACETA SANITARIA 4, 4 (2016)
Julia Raifman, Catherine Ettman, Lorraine Dean, Colleen Barry, Sandro Gale. COVID-19 Related Stressors and Suicidal Ideation (unpublished manuscript on file with counsel)
Kathryn M. Leifheit, Eviction in Early Childhood and Neighborhood Poverty, Food Security, And Obesity In Later Childhood And Adolescence: Evidence From A Longitudinal Birth Cohort, 11 SSM – POPULATION HEALTH 1, 6 (2020)

Kathryn M. Leifheit, Sabriya L. Linton, Julia Raifman, Gabriel L. Schwartz, Emily A. Benfer, Frederick J. Zimmerman, Craig Evan Pollack, <i>Expiring Eviction Moratoriums and COVID-19 Incidence and Mortality</i> (October 2020) (unpublished manuscript on file with author)
Kathryn M. Leifheit, Severe Housing Insecurity in Pregnancy: Association with Adverse Birth Outcomes in A Cohort of Urban Mothers and Infants, Am. Pub. Health Ass'n (Nov. 5, 2019)
Kim Parker, Juliana Menasce Horowitz, & Anna Brown, <i>About Half of Lower-Income Americans Report Household Job or Wage Loss Due to COVID-19</i> , PEW RES. CTR. (Apr. 21, 2020)
Kimberly M. Yousey-Hindes & James L. Hadler, <i>Neighborhood Socioeconomic Status and Influenza Hospitalizations Among Children: New Haven County, Connecticut, 2003–2010</i> , 101 Am. J. Pub. Health 1785 (2011)
Lillian Leung, Peter Hepburn & Matthew Desmond, Serial Eviction Filings: Civil Courts, Property Management, and the Threat of Displacement, Soc. Forces, Sept. 11, 2020, at 19.
Linda M. Niccolai, Kim M. Blankenship, & Danya E. Keene, <i>Eviction from Renter-Occupied Households and Rates of Sexually Transmitted Infections: A County-Level Ecological Analysis</i> , 46 SEXUALLY TRANSMITTED DISEASES 63 (2019)
Map and Data, EVICTION LAB (last visited Oct. 2, 2020)
Mark Hugo Lopez et al., Financial And Health Impacts Of COVID-19 Vary Widels By Race And Ethnicity, PEW RES. CTR. (May 5, 2020)
Mary Clare Kennedy et al., Residential Eviction and Exposure to Violence Among People Who Inject Drugs in Vancouver, Canada, 41 INT'L J. OF DRUG POL'Y 59 61–63 (2017)
Mary Clare Kennedy et al., Residential Eviction and Risk of Detectable Plasma Hiv-1 RNA Viral Load Among HIV-Positive People Who Use Drugs, 21 AIDS BEHAVIOR 1, 7–8 (2017)
Matthew Desmond & Carl Gershenson, <i>Housing and Employment Insecurity Among the Working Poor</i> , 63 Soc. Probs. 46, 47 (2016)
Matthew Desmond & Monica Bell, <i>Housing, Poverty, and the Law</i> , 11 ANN. REV. OF L. & Soc. Sci. 15, 19 (2015).

Matthew Desmond et al., Evicting Children, 92 Soc. Forces 303, 303 (2013)
MATTHEW DESMOND, EVICTED (2016)
Matthew Desmond, Eviction and the Reproduction of Urban Poverty, 118 Am. J. OF Soc. 88, 91
Matthew Desmond, <i>Unaffordable America: Poverty, Housing, and Eviction</i> , FAST FOCUS, NO. 22-2015, at 1–6 (Mar. 2015)
Maxia Dong et al., Childhood Residential Mobility and Multiple Health Risks During Adolescence and Adulthood: The Hidden Role of Adverse Childhood Experiences, 159 Archives of Pediatrics & Adolescent Med. 1104, 1107 (2005)
Maya Brennan, Ally Livingston & Veronica Gaitán, Five Facts About Housing Access for LGBTQ People, URBAN INST. (June 13, 2018)
Michael Baker et al., Household Crowding a Major Risk Factor for Epidemic Meningococcal Disease in Auckland Children, 19 Pediatric Infectious Disease J. 983, 983 (2000)
Michael Levy, Justin Sheen, Anjalika Nande, Ben Adlam, Andrew Greenlee, & Daniel Schneider, <i>COVID-19 Eviction Simulations</i> , GITHUB (2020)19, 29
Michelle D. Layser et al., <i>Mitigating Housing Instability During a Pandemic</i> (forthcoming) (manuscript at 4, 14)15
M. Kermode et al., <i>Tuberculosis Infection and Homelessness in Melbourne, Australia, 1995-1996</i> , 3 Int'l J. Tuberculosis & Lung Disease 901, 901, 905 (1999)
Nat'l Housing L. Project, CDC Eviction Moratorium – Initial Analysis, (Sep. 4, 2020)
Nihaya Daoud et al., <i>Pathways and Trajectories Linking Housing Instability and Poor Health Among Low-Income Women Experiencing Intimate Partner Violence (IPV): Toward A Conceptual Framework</i> , 56 WOMEN & HEALTH 208, 209–10 (2016)
Ninette Sosa, A Closer Look: Arkansas Evictions During COVID-19; Tenant Stories, KNWA FOX24 (Aug. 3, 2020)
North Carolina, U.S. BUREAU OF LAB. STAT. (last visited Oct. 1, 2020)

On the Brink of Homelessness: How the Affordable Housing Crisis and the Gentri- fication of America Is Leaving Families Vulnerable: Hearing Before the H. Comm. on Fin. Servs., 116th Cong. 3 (2020) (statement of Matthew Desmond, Maurice P. During Professor of Sociology, Princeton University)
Over-the-Year Change in Unemployment Rates for States, U.S. BUREAU OF LAB. STAT. (last modified Sept. 18, 2020)
Paige Zhang, et al., Cold Weather Conditions and Risk of Hypothermia Among People Experiencing Homelessness: Implications for Prevention Strategies, 16 INT. J. FOR ENVIRON. RES. ON PUBLIC HEALTH 18, 3259 (Sep. 2019)
Patrick K. Munywoki et al., Frequent Asymptomatic Respiratory Syncytial Virus Infections During an Epidemic in a Rural Kenyan Household Cohort, 212 J. INFECTIOUS DISEASES 1711, 1711 (2015)
Patty R. Wilson & Kathryn Laughon, <i>House to House, Shelter to Shelter: Experiences of Black Women Seeking Housing After Leaving Abusive Relationships</i> , 11 J. OF FORENSIC NURSING 77 (2015)
People at Increased Risk, CTRS. FOR DISEASE CONTROL & PREVENTION (Sept. 11, 2020)
Persons with a Disability: Labor Force Characteristics—2019, U.S. BUREAU OF LAB. STAT. *1 (Feb. 26, 2020)
People with Certain Medical Conditions, CTRS. FOR DISEASE CONTROL & PREVENTION (Sept. 11, 2020)
Peter Hepburn & Renee Louis, <i>Preliminary Analysis: Shifts in Eviction Filings</i> from the CARES Act to the CDC Order, EVICTION LAB
PEW CHARITABLE TRS., AMERICAN FAMILIES FACE A GROWING RENT BURDEN 5 (2018),
Qifang Bi et al., Epidemiology and Transmission of COVID-19 in 391 Cases and 1286 of Their Close Contacts in Shenzhen, China: A Retrospective Cohort Study, 20 LANCET 911, 911 (2020)
Rachel Dovey, <i>What 80 Million Eviction Records Can Tell City Leaders</i> , NEXT CITY (Apr. 9, 2018)
Rachel Garg et al., Rent Requests Higher in States with Few Protections for Renters, WASH. U. IN ST. LOUIS: HEALTH COMM. RES. LABORATORY (Apr. 30, 2020)
ー v = v , ・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・

Racial Data Dashboard, COVID TRACKING PROJECT, (last visited Oct. 5, 2020)	34
Renee Louis, Alieza Durana & Peter Hepburn, <i>Preliminary Analysis: Eviction Claim Amounts During COVID-19 Pandemic</i> (Aug. 27, 2020)	13
Rejane Frederick & Jaboa Lake, <i>Kicking Folks Out While They're Down: How the Premature Lifting of Coronavirus Restrictions Is Increasing Evictions and Worsening the Homelessness Crisis</i> , CTR. FOR AM. PROGRESS (July 27, 2020, 9:07 AM)	
RICHARD ROTHSTEIN, THE COLOR OF LAW (2017)	32
ROBERT COLLINSON & DAVID REED, THE EFFECTS OF EVICTIONS ON LOW-INCOME HOUSEHOLDS, 25 (2018)	
Sara K. Rankin, <i>Punishing Homelessness</i> , 22 New Crim. L. Rev. 99, 126 (2019)1	.7
Sarah M. Ramirez & Don Villareja, <i>Poverty, Housing, and the Rural Slum: Policies and the Production of Inequities, Past and Present</i> , 102 Am. J. OF PUB. HEALTH 1164, 1672 (2012)	9
Selected Circulatory Diseases Among Adults Aged 18 and Over, By Selected Characteristics: United States, 2018, CTR. FOR DISEASE CONTROL & PREVENTION (2018)	
Selected Respiratory Diseases Among Adults Aged 18 and Over, By Selected Cha acteristics: United States, 2018, CTR. FOR DISEASE CONTROL & PREVENTION (2018)	er- 20
Sophie Beiers et at., Clearing the Record: How Eviction Sealing Laws Can Advance Housing Access for Women of Color, ACLU (Jan. 10, 2020)	30
Spotlight on Statistics: The Recession of 2007–2009, U.S. BUREAU OF LAB. STAT. 2 (Feb. 2012)	
Stephanie Schmitt-Grohé, Ken Teoh, & Martín Uribe, <i>Covid-19: Testing Inequality in New York City</i> 8 COVID ECONOMICS: VETTED AND REAL-TIME PAPERS, 27 (CTR. FOR ECON. POL'Y RES., Apr. 22, 2020)	
Stephen Gaetz et al., Youth Homelessness and Housing Stability: What Outcomes Should We Be Looking For?, 32 HEALTHCARE MGMT. F. 73 (2019)	
Stout, Analysis of Current and Expected Rental Shortfall and Potential Evictions the U.S., NAT'L COUNCIL OF ST. HOUSING AGENCIES 36 (Sept. 25, 2020)1	

Temporary Halt in in Residential Evictions to Prevent the Further Spread of COVID-19, 85 Fed. Reg. 55292 (Sep. 4, 2020)
The Color of Coronavirus: COVID-19 Deaths by Race and Ethnicity in the U.S., APM RESEARCH LAB (Sept. 16, 2020)
The COVID Racial Data Tracker, COVID TRACKING PROJECT, (last visited Oct. 5, 2020)
The Employment Situation—August 2020, U.S. BUREAU OF LAB. STAT. *33 (Sept. 4, 2020)
The Employment Situation—July 2020, U.S. Bureau of Lab. Stat. *14 (Aug. 7, 2020)
The Employment Situation—September 2020, U.S. Bureau of Lab. Stat. *14 (Oct. 2, 2020)
The Eviction Tracking System, EVICTION LAB, (last updated Sept. 26, 2020)
The Gap: A Shortage of Affordable Homes, NAT'L LOW INCOME HOUSING COALITION 1 (Mar. 2020)
THE PEW CHARITABLE TRS., AMERICAN FAMILIES FACE A GROWING RENT BURDEN 5 (2018)
The State of the Nation's Housing 2019, Joint Ctr. for Housing Stud. of Harv. U. 4 (2019)
Thomas Kottke et al., <i>Access to Affordable Housing Promotes Health and Well-Being and Reduces Hospital Visits</i> , 22 PERMANENT J. 1, 2–3 (2017)26
Tiffany Ford, Sarah Reber & Richard V. Reeves, <i>Race Gaps in COVID-19 Deaths are Even Bigger Than They Appear</i> , BROOKINGS (June 16, 2020)33
Top Service Requests Oct 09, 2019 to Oct 07, 2020, 2-1-1 COUNTS, (last visited Oct. 8, 2020) 10
Total People Experiencing Homelessness, U.S. INTERAGENCY COUNCIL ON HOMELESSNESS, (last visited Oct. 2, 2020)
Vulnerable Groups, WHO, (last visited Oct. 6, 2020)21
Week 14 Household Pulse Survey: September 2 – September 14, U.S. CENSUS BUREAU at Food Sufficiency and Food Security Tables 2a & 2b (Sept. 23, 2020)

REAU at Housing Table 2b (Sept. 23, 2020)
Yerko Rojas, Evictions and Short-Term All-Cause Mortality: A 3-Year Follow-Up Study of a Middle-Aged Swedish Population, 62 INT'L J. OF PUB. HEALTH 343, 346 (2016)
Yerko Rojas & Sten-Åke Stenberg, Evictions and Suicide: A Follow-Up Study of Almost 22 000 Swedish Households In The Wake Of The Global Financial Crisis, 70 J. of Epidemiology & Comm. Health 409, 412–13 (2016)
Regulations
ATLANTA, GA., CODE pt. III, appx. E, art. II, §§ 24, 26